

The Boeing Company  
P.O. Box 516  
St. Louis, MO 63166-0516  
(314) 232-0232 TELEX 44-857

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464C - BEK

Mr. Patrick Quinn  
Environmental Engineer  
Permits Section  
Division of Environmental Quality  
Missouri Department of Natural Resources  
P.O. Box 176  
Jefferson City, Missouri 65102-0176



RE: The Boeing Company Phase II Environmental Site Assessment Report and Workplan Addendum

Dear Mr. Quinn:

The purpose of this letter is to address your comments to the Boeing Phase II Environmental Site Assessment Report Workplan Addendum submitted for Missouri Department of Natural Resources (MDNR) approval. We appreciate your help and cooperation in development, approval and implementation of this workplan to support the proposed sale of Boeing St. Louis Fabrication Operations.

We are incorporating items as discussed in the conference call on September 18, 2000. To ensure coordination, I would like to address each of your comments and questions by numbers used in your September 19, 2000 letter.

General Comment 1 – Endorsement and Proper Seal of Missouri Registered Geologist

On September 13, 2000, copies of the cover sheets for the Phase II ESA Report and the Workplan Addendum were faxed. These copies included the seal of Dennis Brinkley (Missouri R.G. #0895) of Environmental Science and Engineering (ESE), who directly participated in the field efforts and report preparation activities for these documents.

General Comment 2 – Metal Concentrations, Filtered versus Non-filtered Samples

We believe the groundwater data in combination with the soil data suggest that a problem does not exist with metals contamination at the site. To further demonstrate the absence of any metals impacts and provide a comparison of total and dissolved metals concentrations, we will analyze four samples for metals using filtered and non-filtered analysis. These groundwater sampling points will be located at B27E5, RC8, RR3, and RR5.



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RCRA RECORDS CENTER

General Comment 3 - Ensure Location of "Clean" Groundwater Monitoring Points are Downgradient

Deep and shallow groundwater monitoring points established based on clean shallow soil and groundwater analysis will indeed be located directly downgradient from these clean points.

General Comment 4 – Monitoring Well Registration Forms

Registration forms were forwarded with a letter dated September 1, 2000. Roberts Environmental Drilling records indicate the check associated with the applicable fees was deposited on September 17 by MDNR. Please let us know if you indeed have not received these forms and we will forward copies to the Geological Survey Program.

General Comment 5 - MDNR and GSP Onsite During Drilling and Installation of Deep Groundwater Monitoring Wells

The schedule has been shared, and MDNR and GSP were able to be present during fieldwork activities at the Boeing site.

General Comment 6 - Construction Diagrams for all Monitoring Wells and Temporary Piezometers

Boeing will ensure construction diagrams are added to the appendix of the Phase II ESA Report.

Specific Comment 1 - Section 3.2.1.1 Investigation of Downgradient Locations East of Bldg. 27

If possible (based on the Geoprobe and mobile laboratory investigation results), Boeing will install one nest of deep and shallow groundwater monitoring wells versus two.

Specific Comment 2 - Section 3.2.1.2 Investigation of Recycling Area and Hazardous Waste Area

Metals are included in the analysis of the borings conducted in these areas.

An additional boring was discussed near Bldg. 28 to investigate possible deeper impacts in this area. During the field activity, it is my understanding that it was agreed to review data from existing monitoring wells that are already located in the proposed drilling location. Information from these wells would be used to further define this area.

Total Petroleum Hydrocarbon analysis will be added to boring RC8, which is located downgradient of RC2 in the Recycling Area.

Hydraulic conductivity testing will be added to this investigation.

Specific Comment 3 - 3.2.2 Supplemental Groundwater Evaluation at Bldg. 220

Boeing understands MDNR suggestions related to the deep and shallow well nest to be located near the Bldg. 220 east property line. We would like to continue with the

installation of the well nest and respond accordingly based on the results of the soil and groundwater in this specific area. Information from these wells will allow delineation of horizontal and vertical impact. Should the need for installation of a monitoring point further to the southeast be necessary, we will pursue necessary access agreement to allow Boeing permission to enter neighboring property.

Specific Comment 4 - 3.3.1 Supplemental Soil Evaluation at Bldg. 27

Monitoring wells that exist east of B27E2 will be sampled and analyzed for TPH to evaluate any groundwater impacts in this area.

Specific Comment 5 - 3.2.2 Supplemental Groundwater Evaluation at Bldg. 220

Boring B220N3 will be located as downgradient to B220N1 as physically possible.

Specific Comment 6 - Section 3.3.3 Soil Investigation of Railroad Corridor

Metals analysis will be conducted on RR2 and RR3. In addition, boring RR5 will be located between RR2 and RR3.

Specific Comment 7 - Section 4.1.1 Soil Sampling

Borings in the Workplan Addendum will be grouted per your instructions.

Specific Comment 8 - Section 4.1.2 Groundwater Sampling


Pre-packed well screens are planned for use associated with locations RC6, RC8 and B27W3 at the Recycling Area and Hazardous Waste Area.

Again, Boeing greatly appreciates your help and cooperation in development, approval and implementation of this workplan to support the proposed sale of Boeing St. Louis Fabrication Operations.

Please contact me if you have any questions or if you need additional information.

Sincerely,

THE BOEING COMPANY



Bryan E. Kury  
Environmental and Hazardous Materials Services  
Dept. 464C, Bldg. 220, Mail Code S221-1400  
(314) 234-0652

CC: Jerome Johnson, EPA Region VII